

Exhibit J

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.

Defendants.

Case No. 2:23-CV-00641-JRG-RSP

JURY TRIAL DEMANDED

**SAMSUNG DEFENDANTS' SECOND SET OF INTERROGATORIES
TO HEADWATER RESEARCH LLC (NOS. 14-22)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively, “Samsung”) hereby request that Plaintiff Headwater Research LLC (“Headwater”) answer the following interrogatories in writing, under oath, and in accordance with the following instructions and definitions, within thirty (30) days after service of these interrogatories. Plaintiff shall supplement all responses to these interrogatories as required by the Federal Rules of Civil Procedure and the applicable Local Rules.

DEFINITIONS

1. “Headwater,” “Plaintiff,” “you,” or “your” shall mean Plaintiff Headwater Research LLC and its predecessors, parents, subsidiaries, divisions and affiliated companies, and all past and present directors, officers, employees, agents, and representatives of the foregoing.
2. “Defendants” and “Samsung” shall mean Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.
3. “This litigation” means *Headwater Research LLC v. Samsung Elecs. Co.*, Case No.

Mr. Kagan and any Headwater entity. Case No. 2:22-cv-422, Trial Tr. (Day 5) at 1316:11-15.

INTERROGATORY NO. 18:

If Headwater denies Samsung's Requests for Admission Nos. 1-40, in whole or in part, describe in detail all reasons supporting such denial for each respective Request for Admission.

INTERROGATORY NO. 19:

Describe in complete detail each valuation, offer, or inquiry regarding the value of or offer to sell Headwater (including any related Headwater entities) or financing of the same, by identifying the name of the entities and individuals involved, the date of each valuation, offer, financing, or inquiry; any other consideration or value offered, to be paid, or given by such third party in exchange for the sale; documents reflecting the negotiations, including all materials exchanged between Plaintiff or its Predecessors-in-interest and any third party regarding the proposed sale or financing of Headwater; if the third party did not purchase or finance Headwater, the reasons why it did not do so; any presentations, correspondence, or other documents regarding such discussions or negotiations.

INTERROGATORY NO. 20:

Identify, in list form, every feature (whether developed by Google, Samsung, or another third-party) that Headwater is accusing of infringing one or more claims of the Asserted Patents in this litigation.

INTERROGATORY NO. 21:

Identify and describe in complete detail which of the accused features Headwater contends differentiate between different wireless networks, which of the accused features Headwater contends do not differentiate between different wireless networks, and identify by Bates number all supporting evidence for such contentions.

INTERROGATORY NO. 22:

Identify and describe in complete detail which of the accused features Headwater contends apply only to wireless wide area networks (WWANs), which of the accused features Headwater contends apply to both WWANs and wireless local area networks (WLANS), and identify by Bates number all supporting evidence for such contentions.

Dated: January 27, 2025

Respectfully submitted,

By: /s/ Sara C. Fish
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on counsel of record for Plaintiff via electronic mail on January 27, 2025.

/s/ Sara C. Fish

Sara C. Fish